

HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED CAPITAL FUNDING
CORPORATION,

Plaintiff,

vs.

ERICSSON, INC.,

Defendant.

NO. 2:15-cv-00194-JLR

and Order Granting
STIPULATED AND AGREED TO
MOTION FOR ENLARGEMENT OF TIME
TO FILE RESPONSE TO DEFENDANT
ERICSSON, INC.'S MOTION FOR
PARTIAL SUMMARY JUDGMENT [DKT.
NO. 165]

ERICSSON, INC.,

Third-Party Plaintiff,

vs.

KYKO GLOBAL, INC.,

Third-Party Defendant.

**NOTE ON MOTION CALENDAR:
January 28, 2019**

STIPULATED AND AGREED TO MOTION
FOR ENLARGEMENT OF TIME TO FILE
RESPONSE TO DEFENDANT ERICSSON, INC.'S
MOTION FOR PARTIAL SUMMARY JUDGMENT
No. 2:15-cv-00194-JLR

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1 Plaintiff United Capital Funding Corp. ("United"), by and through its undersigned
2 counsel, pursuant to Fed. R. Civ. P. 6(b)(1)(A) and Local Rules 7 and 10(g), hereby files this
3 Stipulated Motion for Enlargement of Time to File Response to Defendant Ericsson, Inc.'s
4 ("Ericsson") Motion for Partial Summary Judgment [Dkt. No. 165], and in support thereof and
5 states as follows:

6 1. United respectfully requests that the Court grant it a fifteen (15) day enlargement
7 of time, through and including February 19, 2019, to file a Response to Ericsson's Motion for
8 Partial Summary Judgment (Dkt. No. 165) (the "Motion"). Ericsson has stipulated and agreed to
9 United's request for an enlargement of time to file the Response.

10 2. To accommodate the enlargement of time requested by United, the parties have
11 also stipulated and agreed to a corresponding enlargement of time for Ericsson to file its Reply to
12 the Motion, through an including, February 25, 2019.

13 3. On January 17, 2019, Ericsson filed and served United with its Motion. The
14 Noting Date for the Motion is Friday, February 8, 2019. Pursuant to Local Rule 7, United's
15 current deadline to file a Response to the Motion is February 4, 2019 and Ericsson's deadline to
16 file its Reply to the Motion is February 8, 2019.

17 4. Pursuant to Fed. R. Civ. P. 6(b)(1)(A), a court may, for good cause, extend a
18 specified time with or without a motion or notice of the court acts, or if a request is made, before
19 the original tie or its extension expires.

20 5. Good cause exists to grant United's request for an enlargement of time to file a
21 Response to the Motion. During the week of January 21, 2019, United and its counsel, Mssrs.
22 Michael and Jared Ullman, were traveling to, attending, and presenting at a conference in Key
23 West, Florida, which was being conducted by the International Factoring Association. In the
24 days prior to the conference, Mssrs. Ullman were attending to pressing matters in their office and
25 preparing for the conference. Within the next two weeks, Mssrs. Ullman have several hearings
26 and depositions scheduled in other matters. As a result of their prior scheduling obligations, the

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undersigned counsel requires an enlargement of time to evaluate and properly formulate a Response to the Motion.

6. This is the first time that United is requesting an enlargement of time to respond to the Motion, no party will be prejudiced by the granting of this Motion, as Ericsson has agreed and stipulated to the relief requested in this Motion.

7. As such, United requests that the Court enter the Order enclosed hereto approving the stipulation of the parties as to the fifteen (15) enlargement of time, through and including February 19, 2019, for United to file a Response to Ericsson's Motion and through and including February 25, 2019 for Ericsson to file a Reply to its Motion.

WHEREFORE, Plaintiff United Capital Funding Corp. respectfully requests that this Court grant this Motion, entering an Order accepting this Stipulation, providing United with a fifteen (15) day enlargement of time to file a Response to Ericsson, Inc.'s Motion for Partial Summary Judgment (Dkt. No. 165), through and including February 19, 2019, extending the deadline for Ericsson to file a Reply to its Motion until February 25, 2019, and for such other and further relief as this Court deems necessary.

Respectfully submitted January 28, 2019.

ULLMAN & ULLMAN, P.A.

GORDON & REES LLP

BY: /s/ Michael W. Ullman

BY: /s/ Allen W. Estes, III

/s/ Jared A. Ullman

/s/ Sally S. Kim

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STIPULATED AND AGREED TO MOTION
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ORDER

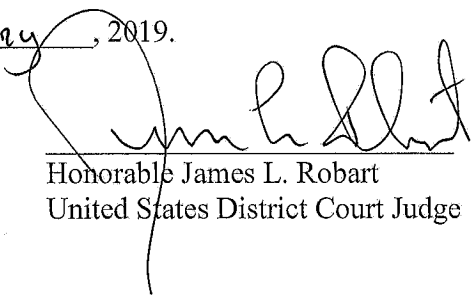
Based upon the foregoing Stipulated Motion for Enlargement of Time for File a Response to Defendant Ericsson, Inc.'s Motion for Partial Summary Judgment [Dkt. No. 165], the Court hereby ORDERS AND ADJUDGES as follows:

1. The Stipulated Motion is GRANTED and ACCEPTED by the Court.
2. Plaintiff United Capital Funding Corp. shall have a fifteen (15) day enlargement of time, through and including, February 19, 2019, by which to file its Response to Defendant Ericsson, Inc.'s Motion for Partial Summary Judgment [Dkt. No. 165].

3. ~~The Noting Date of the Motion for Partial Summary Judgment, and Ericsson, Inc.'s deadline to file a Reply to its Motion for Partial Summary Judgment, is February 25, 2019.~~

IT IS SO ORDERED this 29th day of January, 2019.

4. Ericsson's motion for partial summary judgment (Dkt. #165) shall be noted for the Court's consideration on Friday, March 1, 2019.


Honorable James L. Robart
United States District Court Judge

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CERTIFICATE OF SERVICE

The undersigned declares under penalty of perjury under the laws of the State of Washington that on this date I electronically filed a true and accurate copy of the document to which this declaration is affixed with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the following:

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Dated: January 28, 2019.

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